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VIA ELECTRONIC MAIL

Ms. Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, D.C. 20551
E-mail: regs.comments@federalreserve.gov

***Re: Docket Nos. R-1168, R-1167 and R-1170
Regulation B (Equal Credit Opportunity)
Regulation Z (Truth in Lending)
Regulation M (Consumer Leasing)***

Dear Ms. Johnson:

U.S. Bank submits this comment letter in response to the proposed revisions to Regulations B, Z, and M and the related Official Staff Commentary. We believe that the proposed revisions relating to the “clear and conspicuous” requirements of Regulations B, Z, and M should not be included in the proposed revisions.

The additional burdens imposed by the proposed revisions would create more lengthy and complicated forms, which is something that, in our view, would not benefit consumers. Moreover, this would prove to be an extremely onerous and costly endeavor for U.S. Bank to implement across our substantial consumer automobile leasing and loan portfolios. And, as is often the case in any business, the costs associated with such an administrative burden and undertaking would ultimately have to be passed on to the consumer. But aside from the foregoing, we do not see where the proposed revisions would materially benefit consumers over and above the existing provisions of the regulations.

Accordingly, we respectfully oppose these revisions to Regulations B, Z, and M and we strongly concur with the comment letters submitted by the Association of Consumer Vehicle Lessors, of which we are a member, the Alliance of Automobile Manufacturers, and the American Financial Services Association.

Sincerely,

/s/ Thomas P. Wirth

Thomas P. Wirth
Senior Vice President

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